

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

**EX PARTE MOTION TO SHORTEN NOTICE AND FOR EXPEDITED
HEARING ON THE MOTION REGARDING WITHDRAWAL AS
COUNSEL FOR SOME OF THE DETROIT PUBLIC SAFETY UNIONS**

Erman, Teicher, Zucker & Freedman, P.C. (“Erman Teicher”), requests that the Court expedite the hearing on its Motion Regarding Withdrawal as Counsel for Some of the Detroit Public Safety Unions (the “Withdrawal Motion”) [Docket No. 4537] pursuant to BR 9006(c)(1), 9007 and LBR 9006-1(b). In support of this motion to expedite, Erman Teicher states as follows:

1. Erman Teicher filed its Withdrawal Motion requesting that the firm be allowed to withdraw as counsel for the Settling Public Safety Unions, DPCOA and DPLSA and approving its continued representation of the Non-Settling Public Safety Unions, DFFA and DPOA.

2. The basis for the underlying relief requested is set forth in the Withdrawal Motion.

3. An expedited hearing on the Withdrawal Motion is appropriate because deadlines are immediately approaching.

4. This Court is authorized to grant the requested relief pursuant to Bankruptcy Rule 9006(c)(1) and Local Bankruptcy Rule 9006-1(b).

WHEREFORE, Erman Teicher respectfully requests that the Court enter an order, substantially in the form attached hereto as Exhibit 1, setting the Withdrawal Motion for hearing on an expedited basis.

Respectfully submitted,

ERMAN, TEICHER, ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek

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DATED: May 8, 2014

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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
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IN RE:

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Hon. Steven W. Rhodes

_____ /

EX PARTE ORDER GRANTING MOTION TO EXPEDITE

This matter is before the Court on the *ex parte* motion (the “Motion”) of Erman Teicher for expedited consideration of its Motion (the “Withdrawal Motion”) [Docket No. 4537]. The Court is fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is Granted.
2. A hearing on the Withdrawal Motion is scheduled for _____
at _____.m. (prevailing Eastern Time) before the Hon. Steven Rhodes in
Courtroom 716, Theodore Levin United States Courthouse, 231 W. Lafayette
Blvd., Detroit, Michigan.

3. Any objections to the Withdrawal Motion must be filed on or before _____.

EXHIBIT 2

UNITED STATES BANKRUPTCY COURT
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IN RE:

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Hon. Steven W. Rhodes

_____ /

CERTIFICATE OF SERVICE

The undersigned certifies that on May 8, 2014, the Ex Parte Motion to Shorten Notice and for Expedited Hearing on the Motion Regarding Withdrawal as Counsel for Some of the Detroit Public Safety Unions was electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

Further, a copy of the above pleadings were served by e-mail and facsimile on the following:

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DATED: May 8, 2014